

Greta A. Proctor (Bar No. 254188)
E-mail: greta.proctor@procopio.com
Sean M. Sullivan (Bar No. 254372)
E-mail: sean.sullivan@procopio.com
Yulian Kolarov (Bar No. 345214)
E-mail: yulian.kolarov@procopio.com
PROCOPIO, CORY, HARGREAVES &
SAVITCH LLP
525 B Street, Suite 2200
San Diego, CA 92101
Telephone: 619.238.1900
Facsimile: 619.235.0398

Attorneys for Defendants Blue Ridge Academy,
Samantha Haynes, Lisa Sophos and Jessie Maron

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

JOHN and BREANNA WOOLARD, on
their own behalf and on behalf of their
minor children A.W., E.W., and O.W.;
HECTOR and DIANA GONZALES, on
their own behalf and on behalf of their
minor children C.W.1 and C.W.2; CARRIE
DODSON, on her own behalf and on behalf
of her minor child C.D.,

Plaintiffs,

v.

TONY THURMOND, in his official
capacity as Superintendent of Public
Instruction; et al.,

Defendants.

Case No. 2:23-cv-02305-JAM-JDP

**DECLARATION OF SEAN M.
SULLIVAN CONFIRMING
MEET AND CONFER
REQUIREMENT IN ADVANCE
OF FILING BLUE RIDGE
DEFENDANTS' MOTION TO
DISMISS**

Date: April 9, 2024
Time: 1:30 P.M.
Dept: Courtroom 6
Judge: John A. Mendez

I, Sean M. Sullivan, declare:

1. I am an attorney duly licensed to practice law in the State of California and before this Court. I am a partner with the law firm of Procopio, Cory, Hargreaves & Savitch LLP, counsel for Defendants Blue Ridge Academy, Samantha Haynes, Lisa Sophos and Jessie Maron ("Defendants") in the above-captioned action. The following

1 is based on my own personal knowledge, and if called as a witness, I could and would
2 competently testify thereto.

3 2. I submit this declaration confirming Defendants met the meet and confer
4 requirement pursuant to the Court's standing order (ECF No. 3-2), in advance of filing
5 their motion to dismiss (ECF No. 39). Notice to the Court of our meet and confer
6 efforts was inadvertently not included in Defendants' Notice of Motion to Dismiss.

7 3. On January 5, 2024, my office emailed Plaintiffs' counsel regarding our
8 intent to file a motion to dismiss and seeking to meet and confer. On January 10, 2024,
9 I telephonically met and conferred with Plaintiffs' counsel, Ethan Davis and others, to
10 discuss Defendants' anticipated motion. We did not reach a resolution, so Defendants
11 filed their motion to dismiss.

12 I declare under penalty of perjury under the laws of the United States of America
13 that the foregoing is true and correct and that this declaration was executed by me on
14 this 18th day of January 2024, at San Diego, California.

15
16 /s/ Sean M. Sullivan
17 Sean M. Sullivan
18
19
20
21
22
23
24
25
26
27
28